

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MISSOURI PRIMATE FOUNDATION,)
et al.,)
)
Plaintiff,)
) Case No: 4:16-cv-2163-CDP
v.)
)
PEOPLE FOR THE ETHICAL)
TREATMENT OF ANIMALS, INC., et)
al.)
)
Defendants.)

**PLAINTIFF/COUNTERCLAIM DEFENDANT CONNIE BRAUN CASEY'S MOTION
FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS/COUNTERCLAIM
PLAINTIFFS SECOND MOTION TO COMPEL DISCOVERY AND
DEFENDANTS/COUNTCLAIM PLAINTIFFS' MOTION TO COMPEL INSPECTION
OF PREMISES**

COMES NOW Plaintiff/Counterclaim Defendant Connie Braun Casey (hereinafter "Casey"), by and through undersigned counsel, and for her Motion for Extension of Time to Respond to Defendant/Counterclaim Plaintiff's Second Motion to Compel Discovery, and states as follows:

1. Defendants/Counterclaim Plaintiffs People for the Ethical Treatment of Animals, Inc. and Angela Scott (hereinafter collectively referred to as "PETA") have filed a Second Motion to Compel Discovery directed to Casey and a Motion to Compel Inspection of Premises directed to Casey.

2. As this Court is aware, this Court granted Casey's prior counsel's Motion for Leave to Withdraw on September 4, 2018.

3. Present counsel for Casey has just entered this case, and is attempting to obtain and review all file materials and to review the various pleadings and motions that have been filed up to this time in the case.

4. The discovery requests at issue in PETA's Second Motion to Compel Discovery are sufficiently complex and fact specific that they will require a significant amount of time to address.

5. Furthermore, PETA's Motion to Compel Inspection of Premises also raised a number of complex issues related to the scope of the proposed inspection and the appropriate parameters for any inspection of Casey's premises.

6. Until present counsel for Casey has had a reasonable opportunity perform the necessary work, present counsel is not in a position to prepare a meaningful response to PETA's Second Motion to Compel Discovery and/or PETA's Motion to Compel Inspection of Premises.

7. Under the present circumstances, present counsel for Casey believes an extension of time to provide to respond to the Motions and the discovery requests at issue is appropriate.

8. Furthermore, an extension of time will not be prejudicial to the other parties as it will allow newly entered counsel for Casey to move forward with this matter in an orderly fashion, which should benefit all parties given the current posture of this case.

WHEREFORE, Plaintiff/Counterclaim Defendant Connie Braun Casey prays that grants her an extension of 21 days from the date of this Motion for Extension of Time to Respond to Defendants/Counterclaim Plaintiffs' Second Motion to Compel Discovery and Motion to Compel Inspection of Premises, and for such other and further relief this Court deems necessary and proper under the circumstances.

BY: /s/ Victor H. Essen, II
Debbie S. Champion, #38637MO
Victor H. Essen, II, #57629MO
500 North Broadway, Suite 1550
St. Louis, MO 63102
314-421-4430 / FAX: 314-421-4431
dchampion@rssclaw.com
vessen@rssclaw.com
***Attorney for Plaintiff/Counter-Defendant
Connie Braun Casey***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was sent by the Court's electronic filing system on this 7th day of September 2018 to:

Daniel T. Batten
LAW OFFICE OF DANIEL BATTEN, LLC
P.O. Box 29576
St. Louis, MO 63126
314-452-5757
dtb@lawofficeofdanielbatten.com
Attorney for Plaintiff/Counter-Defendant Connie Braun Casey
Brian D. Klar
KLAR AND IZSAK, LLC
1505 S. Big Bend Blvd.
St. Louis, MO 63117
314-863-1117 / FAX: 314-863-1118
bklar@lawsaintlouis.com
Attorney for Plaintiff/Counter-Defendant Connie Braun Casey

Martina Bernstein
PETA FOUNDATION
1536 16th Street NW
Washington, DC 20036
202-483-7382 / FAX: 202-540-2208
martinab@petaf.org
Attorney for Angela Scott and People for the Ethical Treatment of Animals, Inc.

Marissa Lauren Curran
James P. Martin
Kelly J. Muensterman
POLSINELLI PC
100 S. Fourth Street, Ste. 1000
St. Louis, MO 63102
314-889-8000 / FAX: 314-231-1776

mcurran@polsinelli.com
jmartin@polsinelli.com
kmuensterman@polsinelli.com

Attorney for Angela Scott and People for the Ethical Treatment of Animals, Inc.

Jared S. Goodman
PETA FOUNDATION
2154 W. Sunset Blvd.
Los Angeles, CA 90026
323-210-2266 / FAX: 213-484-1648
jaredg@petaf.org

Attorney for Angela Scott and People for the Ethical Treatment of Animals, Inc.

Geordie L. Duckler
9397 SW Locust St.
Tigard, OR 97223
503-546-8052
geordied@animallawpractice.com

Attorney for Andrew Sawyer

Patrick John Hanley
214 E. Fourth Street
Covington, KY 41011
859-240-5080 / FAX: 859-431-2194
p.hanley@att.net

Attorney for Vito Stramaeglia

/s/ Victor H. Essen, II